



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 1**

**5 Post Office Square, Suite 100**

**Boston, MA 02109-3912**

Via Email - Correct Version

October 25, 2019

Mr. James Campbell  
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And

Mr. Seth Jaffe  
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Mr. Rober Lucic  
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1000 Elm Street, 17<sup>th</sup> floor  
Manchester, NH 03101

Re: Residential Sampling  
EPA's March 27, 2019 response request for additional sampling at residential properties  
Tinkham Garage Superfund Site, Londonderry, NH

Dear Jim,

EPA, in our response to your Private Water Supply Sampling – Ross and Tokanel Drive Residential Sampling Report dated February 7, 2019, submitted on behalf of the Cannons Site Group, and that summarized the initial results of the residential water supply well testing in the neighborhoods located to the south and southeast of the Tinkham Garage Superfund Site (Site), requested that you initiate additional sampling to include:

Quarterly sampling of eight households (which was to be included with the required quarterly sampling being performed at the Boston and Charleston Avenues (Ave.) impacted neighborhood area.) This included six households for continued monitoring related to detections of 1,4 dioxane less than the current NHDES AGQS of 0.32 ug/l and two

households where PFAS concentrations were found greater than ½ the AGQS, which was 70 ng/l at that time.

This sampling was to continue until EPA approved a request otherwise based upon sufficient data and/or results of on-going investigations that indicate to EPA and NHDES's satisfaction that no future impacts are expected through continued use of residential water supply well(s).

In our review of the recent monitoring results, the Agencies are requesting that this sampling be modified to include quarterly monitoring for all households that are provided bottled water service (currently 18 households). The on-going sampling results and subsequent need to provide homes with alternate drinking water underscores the importance of collecting complete data sets throughout these areas of the Site to continue refining the understanding of the current extent of the contamination and the ability of households to draw from the bedrock fractures where contaminants may be migrating. We would also like to obtain a better understanding of the seasonal variation in concentrations of site-related contaminants as is seen in the data within the source areas of the Site. This sampling should be incorporated into the next round of residential data collection expected in November 2019.

The Agencies also request that the November 2019 monitoring event be expanded to include water supply wells for 18 Charleston Ave., Tinkham Realty, the Tinkham Garage, and the pump station well. These locations should be sampled for the same suite of analyses including volatile organic compounds, 1,4-dioxane, and per- and polyfluoroalkyl substances. Each of these wells have exhibited varying concentrations of Site-related contaminants in the past and their inclusion will help to refine the understanding of the nature and extent of impacts at the Site.

In addition, we noticed that the participation level of the residents in the monitoring program has decreased. Our current understanding is that you have reached out and made multiple attempts at communication with all the residents of your requirements under the RI and GMP to provide samples as required and per a schedule. Paragraph 16 of the CD ( Site Access) addresses these efforts requiring that the Settling Parties use all reasonable efforts necessary to obtain or otherwise gain access to a property for the purpose of implementing and monitoring the Response Action.

Finally, we request that following the completion of four consecutive quarters of sampling, we receive a memorandum outlining an assessment and interpretation of the data results. For example, in the area of the Boston and Charleston neighborhood, two households were recently placed on bottled water; the assessment should evaluate the need for borehole geophysics, packer testing or other data collection efforts to assess the capture and continued presence of contamination in these wells and those in the immediate area. It should be noted that packer testing at the nearby 12 Boston Avenue well, provided data which allowed us to better understand the contaminant profile with depth.

The continued sampling of the residential neighborhood is vital in the understanding of the various migration pathways and the overall household capture from bedrock fractures present in this area. The collection of multiple rounds of data will allow for a quicker decision pathway for the protection of human health (e.g. a waterline) and whether there is unacceptable current or potential future risk to these homeowners downgradient of the site as a first measure of these continuing remedial investigations.

We appreciate your continued efforts in this residential sampling process. If you have any questions or concerns, please call me at (617) 918-1244.

Sincerely,

*Cheryl Sprague*

Cheryl L. Sprague  
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